

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

Federal Trade Commission

Plaintiff,

v.

Innovative Marketing, Inc., *et al.*

Defendants,

AND

Maurice D’Souza

Relief Defendant.

CIVIL NO. RDB 08-CV-3233

JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), and defendants Kristy Ross, Marc D’Souza and Maurice D’Souza hereby request that the Court amend the Scheduling Order in this case to accommodate summary judgment briefing. In support of their Joint Motion, the parties state as follows:

1. The current scheduling order does not provide sufficient time for the parties to brief and file motions for summary judgment and oppositions thereto in this large and complex case that features volumes of evidence and multiple experts;
2. The parties have conferred and reached agreement on a revised scheduling order that will permit sufficient time for proper briefing and takes into account the upcoming November and December holidays.

WHEREFORE, the FTC, Kristy Ross, and Marc D'Souza and Maurice D'Souza respectfully request the Court enter the attached revised scheduling order.

Dated: October 14, 2010.

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2010, I caused a true and correct copy of the foregoing Joint Motion to Amend Scheduling Order to be served via the Court's electronic filing system upon:

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**[PROPOSED] ORDER REVISING SCHEDULING ORDER
AND SETTING SUMMARY JUDGMENT BRIEFING SCHEDULE**

Upon consideration of the Joint Motion to Revise the Scheduling Order submitted by the parties to this case and for good cause shown, it is this _____ of October, 2010, HEREBY ORDERED that the deadlines in the Scheduling Order shall be modified as follows:

FTC's Motion for Summary Judgment	November 19, 2010
Defendants' Oppositions to Summary Judgment and Cross-Motions for Summary Judgment	December 17, 2010
FTC's Reply Brief and Opposition to Cross-Motions for Summary Judgment	January 14, 2010
Defendants' Reply Brief	January 28, 2010

Richard D. Bennett
United States District Judge